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LOCKHEED MARTIN

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Mr. William F. Caton

Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Comments of Lockheed Martin Space and Strategic Missiles Sector; CC Docket No. 92-297

Dear Mr. Caton:

The Space and Strategic Missiles Sector of Lockheed Martin Corporation ("Lockheed Martin") hereby submits the following comments in the above-referenced proceeding on the future use of the 28 GHz frequency bands. Lockheed Martin is filing comments at this time for the purpose of supporting a spectrum allocation plan forwarded by The Boeing Company, Hughes Communications Inc., Teledesic Corporation and Texas Instruments, Inc. (the "Spectrum Plan Proponents"). 1/ Lockheed Martin respectfully submits that acceptance of the comments set forth below, although filed outside the normal comment periods in this docket, would serve the public interest by demonstrating further support for the 28 GHz allocation plan recommended by the Spectrum Plan Proponents; and by creating a more complete record in an important FCC proceeding where spectrum decisions will vitally affect the future role of the U.S. commercial satellite industry.

The new spectrum sharing plan was submitted by the Spectrum Plan Proponents as a means of resolving the competing claims of satellite and terrestrial users for access to the 28 GHz band. Lockheed Martin believes that this plan satisfactorily meets the 27.5-30.0 GHz spectrum needs of the fixed-satellite service (for both non-geostationary and geostationary systems); feeder links for non-geostationary systems in the mobile-satellite service; the fixed service; and the local multipoint distribution service. It therefore urges the Commission to adopt

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^{1/} See letter dated May 12, 1995, to William F. Caton, Acting Secretary of the FCC, from Counsel for the Boeing Company, Hughes Communications, Inc., Teledesic Corporation and Texas Instruments, Inc.

this proposed spectrum allocation plan and to initiate a further proceeding for developing licensing, service and associated rules for use of the 28 GHz band.

Lockheed Martin supports the 28 GHz sharing proposal set forth on Attachment 1 because it offers a feasible framework to accommodate the current spectrum needs of various satellite and terrestrial interests. At the same time, however, Lockheed Martin urges the FCC to refrain from taking any action that might jeopardize the future use of the 28 GHz band by the satellite industry as it endeavors to develop and deploy new international satellite systems. The 28 GHz band is currently allocated internationally for satellite services, and the United States should strongly support satellite allocations in this spectrum both domestically and on a worldwide basis.

Future satellite systems, many of which will be implemented by U.S. industry, will become an integral part of the Global Information Highway. Officials responsible for setting satellite policy must look beyond today's satellite system designs when allocating spectrum for domestic and international satellite systems. Indeed, they must ensure that tomorrow's new international constellations have sufficient spectrum available on a global basis to be able to meet the challenges of affording communications and information services to a worldwide community. From the perspective of the U.S. satellite industry, preserving domestic and international satellite allocations in the 28 GHz band is of vital importance so that new international satellite systems can develop and flourish.

The public interest benefits of preserving the 28 GHz band for satellite uses globally are enormous, especially when balanced against narrower alternative proposals for these bands. The FCC should support the spectrum needs of the broader aerospace/satellite service/satellite manufacturing industry for many reasons, but especially because of the significant economic and other opportunities the industry will create if access to the 28 GHz band is maintained:

• The deployment of new domestic and international satellite systems will afford a broad range of telecommunications and information services that promise high quality, flexible and portable capabilities to meet the needs of consumers globally. For example, the Commission recognized in its rulemaking on mobile-satellite services ("MSS") above 1 GHz that applications of proposed MSS systems are "almost limitless", including the provision of ubiquitous voice and data mobile

services, position location services, search and rescue communications, disaster management communications, environmental monitoring, paging services, facsimile transmission services, cargo tracking, and industrial monitoring and control. Moreover, new fixed-satellite proposals and video systems offer a wealth of other innovative services that will serve business and consumer needs, and will also facilitate the dissemination of educational, medical and other vital information around the world.

- Meeting the demand for new satellite-based technologies will create a major global industry that will provide telecommunications products and services worldwide. This development will play an important role in achieving U.S. economic goals, including increased U.S. trade; greater opportunities for all sectors of the U.S. aerospace/satellite industry; and the creation of vast numbers of new high-paying jobs for the American people.
- Accommodating the spectrum requirements of new international satellite systems will demonstrate FCC support for the special requirements of American manufacturers, like Lockheed Martin, as their businesses evolve from defense-related programs to commercial applications. Spectrum decisions that support the burgeoning opportunities in the international satellite market will assist the redeployment of personnel and other resources as defense manufacturers shift focus from traditional defense-related projects to new commercial environments.
- Supporting the spectrum needs of the U.S satellite industry will foster American leadership in the international telecommunications arena. American businesses can gain enormous advantages in the worldwide marketplace if they are able to take the lead in rapidly deploying new satellite-based communications and information technologies. In order to achieve these leadership goals, government officials must make spectrum decisions that will spur the final development and deployment of new domestic and international satellite services.

For all these reasons, Lockheed Martin encourages the Commission to adopt the spectrum allocation plan set forth on Attachment 1. This action would accommodate the 27.5-30.0 GHz spectrum needs of competing satellite and terrestrial services. It would also facilitate the deployment of new domestic and international satellite systems that promise to transform the global communications and information marketplace as we know it today.

Respectfully submitted,

Gerald Mysarra

Senior Director,

Commercial Programs

GM/db Attachment

cc:

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Attachment 1

27.5	LOCAL MULTIPOINT DISTRIBUTION SERVICE
28.0	Fixed-Satellite Service
	FIXED-SATELLITE SERVICE (Non-GEO) Fixed-Satellite Service (GEO) Fixed
28.5	FIXED-SATELLITE SERVICE (GEO) Fixed-Satellite Service (Non-GEO) Fixed
29.0	FIXED-SATELLITE SERVICE (Non-GEO MSS Peeder Links) LOCAL MULTIPOINT DISTRIBUTION SERVICE
29.5	FIXED-SATELLITE SERVICE (GEO) Fixed-Satellite Service (Non-GEO)
30.0	